

DISTRICT OF MASSACHUSETTS

SHEILA PORTER,
Plaintiff

v.

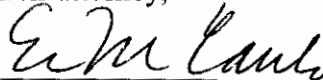
ANDREA CABRAL, SUFFOLK
COUNTY SHERIFF'S DEPARTMENT,
SUFFOLK COUNTY, and
CORRECTIONAL MEDICAL
SERVICES, INC.
Defendants

Civil Action No. 04-11935-DPW

**DEFENDANTS ANDREA CABRAL, SUFFOLK COUNTY SHERIFF'S
DEPARTMENT AND SUFFOLK COUNTY'S MOTION TO IMPOUND THEIR
MEMORANDUM IN OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL
DISCOVERY**

Now comes the above Defendants, by their undersigned counsel, and respectfully request pursuant to Local Rule 7.2 that the Court impound their Memorandum in Opposition to Plaintiff's Motion to Compel. As grounds therefore, the Defendants state that the Memorandum contains information and documents that have been designated as confidential pursuant to the Protective Order issued in this case. The Defendants request that these material be impounded until further order of the Court.

Respectfully submitted
For Defendants Andrea Cabral,
Suffolk County Sheriff's Department and
Suffolk County
By their attorney,

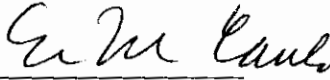


Ellen M. Caulo, BBO #545250
Deputy General Counsel
Suffolk County Sheriff's Department
200 Nashua Street
Boston, MA 02114
(617) 961-6681

Dated: September 23, 2005

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this document and the Defendants' Memorandum in Opposition to the Plaintiff's Motion to Compel on counsel for all parties.



Ellen M. Caulo